

City of Milwaukee

Department of Employee Relations

**Guidelines on Conducting
Pre-Employment Background Checks**

January 2013



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Introduction

The City of Milwaukee conducts pre-employment background checks to determine candidates' suitability for employment through evaluations of their past behaviors. The purpose of the background investigation process is to screen out candidates based on unsuitable behavior, to verify candidates' qualifications, to confirm their areas of expertise and ability, and to obtain and evaluate information regarding personal characteristics such as honesty and reliability, which are not usually covered in the testing process. Background checks can include a variety of components depending upon the nature of the vacancy. The Department of Employee Relations (DER) background checks primarily include conviction checks although DER may also verify college degree(s) and licenses.

In addition to the services that the Department of Employee Relations provides in terms of pre-employment screening, the City has a contract with a third party vendor called Sterling InfoSystems that provides a variety of background check services **for a fee**. Departments utilizing Sterling's services **incur all associated costs** and must ensure that the information requested is applicable to the position in question. Because of the invasive nature of such checks, it is imperative to protect prospective employees' right to privacy and to comply with all applicable state and federal laws.

Why should background checks be conducted?

Information gained through such a check may reveal important information about the candidate and may help eliminate some post-hire problems. Employers conduct background checks on potential employees for reasons such as:

Negligent Hiring: The threat of employer liability gives us reason to conduct checks regarding a candidate's background. Such checking may enable the department to avoid the occurrence of such incidents as workplace violence as well as lawsuits resulting from negligent hiring.

False or Inflated Information: In order to ensure that the prospective employee meets the requirements for the job, it is important to verify candidate-provided information such as credentials, reason for separation from employment, actual position(s) held and period of employment.

Federal and State Laws: Certain laws require background checks be conducted for anyone who works with children, the elderly or disabled or for those requiring security clearances. Wisconsin's Caregiver Law requires background and criminal history checks of certain personnel who are responsible for the care, safety and security of children and adults. The law also requires covered entities to investigate and report incidents of misconduct (abuse, neglect or misappropriation of property). See full text at: <http://www.dhs.wisconsin.gov/caregiver/CBCprocess.htm>.

Potential Performance Issues: A reference check may reveal issues that directly relate to job performance such as the ability to work with people and reliability.

Potential benefits of conducting pre-employment background checks include: protection of City assets; increased job performance; a reduction in turnover; protection of employees and the public against theft, violence, drugs, and harassment; and a safeguard against negligent hiring lawsuits.

Potential risks of background checks include the receipt of information that is irrelevant, taken out of context or inaccurate. During the selection process, requesting or utilizing information that is irrelevant or unrelated to the job being applied for may be illegal and puts the City at risk for potential litigation.

What are the components of a background check?

The components of a background check vary depending upon the nature of the position being applied for. Therefore, it is important to tailor the type of check that is conducted to the position in question to ensure compliance with all applicable state and federal laws. The Department of Employee Relations carries out certain components prior to a candidate's being certified to an eligible list. The hiring authority carries out other components as identified below either independently or by utilizing the third-party vendor, Sterling InfoSystems.

Remember: All associated fees for using Sterling InfoSystems are the sole responsibility of the hiring authority.

Candidates are required to sign and date their employment application certifying that the information provided is true and complete. Specifically, their signature on the employment application certifies the following:

I certify that all answers to questions on this application are **true and complete**. I understand that **falsification of this application may result in disqualification or removal from a City position**. I understand that a City Charter Ordinance requires City employees to live in the City. I also understand that covered employees are compensated for overtime work in accordance with the Fair Labor Standards Act. Individuals should discuss overtime pay practices with the appointing authority prior to accepting employment with the City. **I authorize the City to make any inquiries about and receive any information about my suitability for employment. I give permission to persons contacted to provide such information. Such inquiries may include, but are not limited to the quality and quantity of my work, work record, qualifications, education, and criminal records as defined above.** I forever waive, release and covenant not to sue any person or organization for any result of providing, obtaining or acting upon such information. I understand that such information is sought with confidentiality, and I will not request copies of such information. A copy of this authorization shall be effective as the original.

This certification authorizes DER and the hiring authority to conduct independent inquiries regarding the candidate's suitability for hire. If the hiring authority opts to use a third-party to inquire into the candidate's background and if that inquiry includes a credit check, a separate authorization is required by law under the guidelines of the Fair Credit Reporting Act. (See page 8)

NOTE: If the hiring authority finds any discrepancy between the information the candidate provided on the application and the information received in the course of the background check, DER must be notified as the candidate may be disqualified for falsification.

Employment History

DER reviews the employment history listed on the application to determine whether the candidate meets the minimum experience qualifications for the job. These determinations are based on statements made by the applicants **and are not verified during the screening process.**

Conviction Record

- DER conducts conviction record checks on all candidates before placement on an eligible list. **NOTE:** *These conviction reviews include only State of Wisconsin convictions except for out-of-state convictions listed on the application by the candidate. DER staff will request out-of-state conviction records whenever the information is available per applicable state public records law.*
- The hiring authority has the option to do one of the following:
 - Use recently constructed eligible lists, with no further conviction review since DER has already conducted Wisconsin conviction record checks on all candidates immediately prior to placement on the lists; **NOTE: For older eligible lists, DER highly recommends that the hiring authority update the conviction check.**
 - Request conviction information independently or utilize the third-party vendor, Sterling Infosystems, to provide conviction information to the hiring authority who then determines the job relatedness of the conviction. ***CAUTION:** *You must ensure that all applicable state and federal laws are adhered to in making a determination that a conviction is related to the position in question. DER is available to review any conviction related decisions prior to removing a candidate from an eligible list. Refer to attachment "C" for information on City Service Rule III, Section 8, regarding candidates' right to appeal removal from an eligible list if the conviction record is determined to be job related.*

Education and occupational license or certification verification

- DER reviews applications to determine whether applicants meet education and licensing or certification requirements. DER may require applicants to provide college transcripts or proof of licensure or certification at the time of application.
- If not done by DER, the hiring authority should verify that a candidate **has the credentials** to meet the educational requirements. This can be done independently or by utilizing the third-party vendor, Sterling.

State Licensing or Certification verification

- DER may require candidates to provide proof of any license or certification, to ensure that he/she is in compliance with the minimum requirements for the job. (e.g. electrician, boiler operator, etc.)
- The hiring authority should independently verify licenses and certifications or utilize the third-party vendor; Sterling, to verify that state licensing and certification requirements are met.

Driving Record

- DER may obtain driving records from the State of Wisconsin Department of Motor Vehicles (DMV) to ensure that the candidate is in compliance with requirements for jobs that require a valid driver's or commercial driver's license.
- If not done by DER, the hiring authority should independently verify or utilize the third-party vendor, Sterling, to verify driver licensing requirements.

Credit History

- DER does not conduct credit checks.
- The hiring authority may conduct credit checks for jobs that have financial or fiduciary responsibilities, senior executive positions and/or those positions that have direct access to highly confidential information. **CAUTION:** *Hiring decisions based solely upon credit history take on the additional burden of showing the business necessity and job relevancy of using the report to make said decision. A separate consent form is necessary to run a credit check. The Fair Credit Reporting Act (FCRA) has specific guidelines that employers must adhere to when using credit history in making a hiring decision.*

Professional Reference check

A professional reference does not refer to family, friends or acquaintances. Ideally, the candidate's professional references should include a former supervisor.

- DER does not conduct professional reference checks.
- The hiring authority should conduct professional reference checks either independently or by utilizing the services of third-party vendor, Sterling.
NOTE: Please see Attachment "A" for a sample Reference Check Form.

Social Networking Search (Facebook/Twitter)

- DER does not conduct social networking searches.
- The hiring authority can independently conduct a social networking search or utilize the services of the third-party vendor Sterling. DER strongly advises against conducting social networking searches as part of a routine background check. *Simply viewing a candidate's social networking site has the potential to provide subjective information regarding off-duty behavior that is not job-related and may unduly influence a hiring decision.* For City of Milwaukee employment, this type of search is primarily used in the process of hiring protective services personnel or those requiring a high level of security clearance. **CAUTION:** *You must ensure that all applicable state and federal laws are adhered to in making a determination that information gained from a social networking site is related to the position in question. Hiring decisions based upon information gained from social networking sites (visual or written information), take on the burden of showing the business necessity and job relevancy of using the information gained to make said decision.*

What are the legal concerns regarding background checks?

Background checks are a necessary part of the hiring process; however, candidates and current employees do have a right to privacy as to the extent of the check and how the information gained is utilized. Caution should be taken to ensure that your inquiries are applicable and job related and that you have the consent of the candidate **prior to** executing a check. In addition to these “general” considerations, there are specific laws that must be adhered to concerning the use of information contained in certain records such as:

CONVICTION RECORDS: The Wisconsin Fair Employment Act (WFEA), Section 111.321, prohibits discrimination based upon arrest and/or conviction record. (Full text available at: <http://legis.wisconsin.gov/statutes/Stat0111.pdf>)

Arrest Records: Arrest record is defined as “information indicating that an individual has been questioned, apprehended, taken into custody or detention, held for investigation, arrested, charged with, indicted or tried for any felony, misdemeanor or other offense pursuant to any law enforcement or military authority”. With two exceptions, the WFEA prohibits an employer from making any inquiry, on an application form or otherwise, regarding a person’s arrest record.

The only two exceptions are inquiries about a charge that is still pending and inquiries when employment depends upon the bondability of the individual.

Conviction Records: Conviction record is defined as “information indicating that an individual has been convicted of a felony, misdemeanor or other offense, has been adjudicated delinquent, has been less than honorably discharged or has been placed on probation, fined, imprisoned, placed on extended supervision or paroled pursuant to any law enforcement or military authority”. The WFEA states that it is not employment discrimination to refuse to employ or terminate from employment any individual who has been convicted of any felony, misdemeanor or other offense(s) **ONLY when the circumstances of the offense(s) substantially relate to the circumstances of the particular job.**

In addition to the WFEA, Federal Law under Title VII of the Civil Rights Act of 1964, as amended, provides individuals the same type of protection against discrimination as the WFEA. Title VII states that where there is evidence of adverse impact, an absolute bar to employment based solely upon the fact that an individual has a conviction record is unlawful unless the employer can show that the decision was based upon business necessity by considering:

(Full text available at: http://www.eeoc.gov/policy/docs/convict1.html#N_1_)

1. The nature and gravity of the offense or offenses.
2. The time that has passed since the conviction and/or completion of the sentence; and
3. The nature of the job sought or held.

To ensure compliance with these laws and provide consistency in the application of these laws, the Department of Employee Relations uses a conviction review

panel which reviews all conviction records for candidates prior to their placement on the eligible list. (See Attachment “C” for DER’ guidelines on substantially related convictions.)

CREDIT REPORTS: The Fair Credit Reporting Act (FCRA) is a law that was enacted to protect the privacy and accuracy of information contained in a credit report. To be covered by the FCRA, the credit report must have been prepared by a consumer reporting agency (CRA) such as Equifax, Experian or TransUnion. The Federal Trade Commission (FTC) enforces the FCRA and has developed criteria that must be followed by employers that utilize credit reports for employment purposes such as hiring, promotion, reassignment, etc. FTC legal guidelines for employers are as follows:

(Full text available at: <http://business.ftc.gov/documents/bus08-using-consumer-reports-what-employers-need-know>)

Written Notice and Authorization Required

If a candidate’s credit report is to be utilized for employment purposes, you must first:

- Notify the candidate in **writing**, that a credit report will be utilized as part of the background investigation, and;
- Obtain the candidate’s **written** authorization prior to requesting the report from a CRA.

Before releasing an individual’s consumer report, the CRA will require you to certify that you are in compliance with the FCRA and that you will not misuse any information in the report in violation of federal or state equal employment opportunity laws or regulations.

Adverse Action Procedures

If you rely on a credit report for an “adverse action”, for example disqualifying or refusing to hire, be aware that:

- **Before** you take the adverse action, you must give the individual a **pre-adverse action disclosure** that includes a copy of the individual’s credit report and a copy of “A Summary of Your Rights Under the Fair Credit Reporting Act” — a document developed by the Federal Trade Commission (FTC). The CRA that furnishes the individual’s report will give you the summary of consumer rights.
- **After** you’ve taken an adverse action, you must give the individual notice — orally, in writing, or electronically — that the action has been taken in an **adverse action notice**. It must include:
 - The name, address, and phone number of the CRA that supplied the report;
 - A statement that the CRA that supplied the report did not make the decision to take the adverse action and cannot give specific reasons for it; and
 - A notice of the individual’s right to dispute the accuracy or completeness of any information the agency furnished, and his

or her right to an additional free consumer report from the agency upon request within 60 days.

In any case where information contained in a credit report is a factor in your hiring decision, even if the report information is not a major factor, you must follow the pre-adverse action guidelines before rejecting the candidate.

Non-Compliance Consequences

There are legal consequences for employers who fail to obtain a candidate's permission prior to requesting a credit report or who fail to provide the pre-adverse and adverse action notice. Under the FCRA, individuals can sue employers for damages in federal court. A person who successfully sues is entitled to recover court costs, legal fees and allows punitive damages to be sought for deliberate violations of the FCRA. In addition, the FTC, other federal agencies, and the State of Wisconsin may sue employers for noncompliance and obtain civil penalties.

In Practice: The Department of Employee Relations does not conduct credit checks. The hiring authority should only be requesting credit reports for positions that have financial or fiduciary responsibilities, senior executive positions and/or those positions that have direct access to highly confidential information.

MEDICAL REPORTS/INQUIRIES: Title I of the American with Disabilities Act (ADA) prohibits private employers and state and local governments from discriminating against qualified individuals with disabilities on the basis of their disabilities. Under the ADA, an employer may require a medical exam to determine if the applicant is "fit" to perform the essential functions of the position applied for. The ADA also specifies when an employer may make "disability-related inquiries," i.e., inquiries that are likely to elicit information about a disability. (*Full text available at: <http://www.eeoc.gov/laws/types/disability.cfm>*)

- When hiring, an employer may not ask questions about disability or require medical examinations until after it makes a conditional job offer to the candidate.
- After making a job offer (but before the person starts working), an employer may ask disability-related questions and conduct medical examinations as long as it does so for all individuals entering the same job.

In Practice: The City of Milwaukee requires individuals to pass medical exams/drug screens, following their acceptance of offers of employment. This requirement is administered according to all state and federal laws.

SCHOOL RECORDS: Under the Family Educational Rights and Privacy Act (FERPA), educational records are confidential and will not be released by the school without the adult-age student's written consent. (*Full text available at <http://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html>*)

In Practice: For City of Milwaukee jobs that have educational requirements (i.e. associate degree, bachelor degree, etc.) **the candidate may be required** to provide college transcripts at the time of application.

MILITARY RECORDS: Under the Privacy Act of 1974, military service records are confidential and can only be released under limited circumstances and with the written consent of the subject of the record(s). Inquiries not authorized by the subject of the records must be made under the Freedom of Information Act (FOIA), which allows for the full or partial disclosure of certain records maintained by the federal government. (*Full text available at <http://www.justice.gov/opcl/privstat.htm>*)

In Practice: For City of Milwaukee candidates that are requesting military preference points, **the candidates are required** to attach form DD-214 "Report of Separation" to the applications as proof of military service.

When should a background check be conducted by the appointing authority?

The background check can be completed at any time after receipt of the names of candidates referred, but always prior to an offer of employment. **NOTE: Because of cost, it is recommended that the check be conducted on top candidates only.**

What about temporary appointments, reinstatements, transfers, and promotions?

The Department of Employee Relations does not conduct background checks on temporarily appointed employees or employees appointed through transfer or promotion. DER does conduct conviction checks on reinstatements of former employees.

The hiring authority should conduct criminal background checks on temporarily appointed employees and reinstatements (for out-of-state convictions). **NOTE: All applicable laws and requirements in conducting background checks on new candidates also apply to current or returning employees.**

Departments should conduct reference checks on temporary employees and, depending on the circumstances, should consider conducting reference checks for reinstatements, transfers, and promotions.

What City Service Commission (CSC) rules apply if a candidate is disqualified based upon information included in the background check?

Rule III, Section 8 and Rule VII, Section 8 provide for the disqualification of candidates and candidate appeals.

A department which wishes to remove a candidate from an eligible list based on a background investigation must request that DER remove the candidate from the eligible list and provide a letter documenting the reasons for the removal request. The department should also document its disqualification decision on the candidate referral form.

A candidate removed from an eligible list has appeal rights before the CSC. DER notifies the candidate of the removal action and of his/her appeal rights. When a candidate utilizes his/her appeal rights, the department must defend its request for removal before the Commission.

Where should background check documentation be filed and for how long?

Background check documentation should be treated in the same manner that medical documentation is treated. As such, background check documentation should be kept in a confidential file separate from the employee personnel file. Access to this type of information should be restricted to a "need-to-know" basis only.

The retention schedule for criminal background check related documentation is:

Candidates that ARE hired:

Date of Separation +8.0 years: then destroy under supervision (DUS)

Candidates that ARE NOT hired:

Date of Personnel Action +4 years: then destroy under supervision (DUS)

Although this schedule was created specifically for criminal background records, DER is advising that the hiring authority follow this schedule for all background check-related records received from third-party vendor, Sterling InfoSystems.

Who can I contact if I have questions regarding these guidelines?

You can contact Rebecca Reyes Duke at X6210 or at rrduke@milwaukee.gov.

Who can I contact if I have questions regarding the third party vendor Sterling Infosystems?

You can contact Matt Mortwedt at X2145 or at Matthew.Mortwedt@milwaukee.gov.

For additional information on hiring new employees:

See attachment "D" or click here to view the Department of Employee Relations "Hiring Checklist" to ensure that all necessary steps are completed when interviewing and hiring new employees:

<http://city.milwaukee.gov/ImageLibrary/User/jkamme/Forms/>

ATTACHMENTS

Attachment A – Sample Pre-Employment Reference Check Form

****This is a non-exhaustive list that can be modified as needed based upon the type of position being filled****

Date of Reference Check: _____

Candidate Name: _____

Position Applying For: _____

Name/Title of Reference: _____

Company: _____

Contact Information: _____

The applicant is being considered for the following position _____. (Describe the duties of the position)

What position did the candidate hold in your company?

What were his/her dates of employment?

How long have you worked with the candidate and what was your working relationship?

What was the candidate's reason for leaving your company?

Please outline his/her position and main job responsibilities.

What do you consider to be the candidate's key strengths?

What would you consider to be his/her areas for improvement?

If candidate supervised/managed any employees, how would you describe his/her supervisory/management skills?

How did he/she get along with co-workers?

How would you describe the candidate's punctuality and reliability?

Can he/she handle pressure? Can you support this with an example?

How would you describe the candidate's ability to handle conflict?

How would you describe the candidate's ability to deal with confidential information?

Did he/she work as part of a team and if so, what contribution did candidate make?

What would you say was his/her biggest accomplishment while working at your company?

Theoretically, would you re-employ him/her?

Can you tell me the candidate's salary at the time of leaving?

Is there anything that I have not asked about that someone considering this person for a job should know?

Attachment C - Substantially Job Related Convictions Guidelines

Legal Basis

The Wisconsin Fair Employment Act (Wis. Stat. 111.321, 111.322, 111.335) prohibits discrimination based on conviction record unless the circumstances surrounding the conviction are substantially related to the circumstances of the particular job. The manifest intent of this statute is to encourage the employability and rehabilitation of the ex-offender while protecting the employer and the public against unreasonable risks.

Conviction record is defined under Section 111.32(3):

Conviction record includes, but is not limited to, information indicating that an individual has been convicted of any felony, misdemeanor or other offense, has been adjudicated delinquent, has been less than honorably discharged, or has been placed on probation, fined, imprisoned, placed on extended supervision or paroled pursuant to any law enforcement or military authority.

Section 111.335 of the Act allows employers to disqualify candidates based on conviction record when the conviction is related to the job:

(c)...it is not employment discrimination because of conviction record to refuse to employ or license, or to bar or terminate from employment or licensing, any individual who: 1. Has been convicted of any felony, misdemeanor or other offense the circumstances of which substantially related to the circumstances of the particular job or license activity.

The nature of the substantially related test was determined by the Wisconsin Supreme Court in County of Milwaukee v. LIRC and Serbin as follows:

Assessing whether the tendencies and inclinations to behave a certain way in a particular context are likely to reappear later in a related context, *based on the traits revealed* is the nature of the test. What is important in this assessment is not factual details related to such things as the hour of the day the offense was committed, the clothes worn during the crime, whether a knife or gun was used, whether there was one victim or a dozen or whether the robber wanted money to buy drugs or raise bail money for a friend. All of these could fit a broad interpretation of “circumstances.” *However, they are entirely irrelevant to the proper “circumstances” inquiry required under the statute. It is the circumstances which foster criminal activity that are important, e.g., the opportunity for criminal behavior, the reaction to responsibility, or the character traits of the person.* 139 Wis. 2d at 823-24. (emphasis added)

Determination of Substantial Job-Relatedness

The determination of whether a conviction is substantially related to a job requires a comparison of the essential functions, duties, and conditions of the job with the crime to determine if there is opportunity to engage in similar criminal behavior, to demonstrate a similar reaction to responsibility, or to demonstrate the character traits shown by the crime. Examples of job conditions that could be relevant, depending on the conviction, include access to confidential or sensitive information, degree of independence and responsibility, and degree of interaction with the public or with children.

The following examples demonstrate the substantial job-relatedness of crimes to jobs:

-A candidate with a conviction for child enticement, for exposing genitals or pubic area to a child, or for violating the gun-free school zone law who has applied for the job of School Safety Assistant (a job involving constant contact and interaction with students).

-A candidate with a conviction for possession with intent to deliver who has applied for the job of Code Enforcement Inspector I (a job involving fire prevention and building maintenance inspection of buildings around the City).

-A candidate with a conviction related to identity theft who has applied for the job of Vital Statistics Supervisor (a job with responsibility for administering and coordinating activities of the Vital Statistics Office including the proper registration and issuance of birth and death certificates).

Consideration may also be given to the time that has passed since the conviction and/or completion of the sentence as part of the determination of the substantial job-relatedness of an applicant's conviction(s).

When conducting the job-relatedness analysis, less weight may be given to an older conviction than a similar, more recent conviction. However, an older conviction that is particularly serious may still warrant the rejection of an application. The analysis of the seriousness of the conviction, and the time that has passed since an applicant's conviction and/or completion of sentence as part of the determination of the job-relatedness of a conviction will be made on a case-by-case basis.

Pending Criminal Charge

Under state law, an employer may suspend employment or refuse to employ a candidate if a pending criminal charge substantially relates to circumstances of a particular job or licensing activity. Therefore we propose to treat pending criminal charges as we treat convictions—determining whether the pending charge is substantially job-related. A candidate whose pending criminal charge was determined to be job-related would have a flag or hold placed next to his/her name on the eligible list. The person would not be referred to hiring departments for employment until the charge was dismissed or dropped. Persons convicted would be disqualified and stricken from the eligible list.

Panel Determination

A two person panel of DER staff members will make the determination of substantial job-relatedness. The panel will determine by consensus that the conviction record is or is not job related and reduce the basis of their findings and recommendation to writing. The panel will report its findings and recommendation to the Employee Relations Director or the Human Resources Staffing Manager for review.

Conviction Record Disqualification and Appeal Notice

If the conviction record is determined to be substantially job related, the candidate will be notified that she/he is disqualified under City Service Rule III, Section 8c:

Has been convicted of a crime the circumstances of which are substantially related to the position for which the applicant/eligible seeks employment.

The individual will be apprised of his/her right to appeal the decision to the City Service Commission.

Attachment D - Hiring Checklist

1.	Make sure ALL candidates that you interview who are new to City employment sign the Pre-Employment Controlled Substances/Drug Test Requirement and Consent Form at the interview. (These completed forms should be kept with your interview materials.)
2.	Provide the candidates at the interview with a copy of the Concentra "Authorization for Medical Examination and Pre-placement Drug Testing" form. Make sure the title for the position being filled and the Physical Exam number have been filled in, and the components of the exam checked. Make sure the appropriate drug test type is checked, and the form is signed at the bottom. Also provide the candidate with "Donor Instructions". If you have any questions or comments regarding the exam components, please call Michelle Stein (Ext. 3394) immediately (before giving form to applicant for physical exam). For positions requiring a CDL , also give them the yellow "DOT Collection Site Intake form".
3.	Verify the degrees, licenses or other credentials required for this position. Check their backgrounds to ensure that interviewees meet requirements. Check for any restrictions these individuals may have. Conduct a criminal background investigation. Contact Michelle Stein at Ext. 3394 if you have any questions (mstein@milwaukee.gov). It is important to follow this procedure and to notify the Certification Section (see steps 4, 5.a. and 5.b.) to successfully implement the City's Drug Testing Policy. Your department head and your policy information coordinator have a copy of the City of Milwaukee Pre-Employment Drug Testing Policy.
4.	Contact the Certification Unit (Ext. 3395 or kkamla@milwaukee.gov), to confirm that this appointment will be appropriate under Civil Service Rules before making a job offer.
5.	If your new hire is new to City employment, they must pass a pre-employment medical examination and a drug test before they are able to start work with the City of Milwaukee. DER will send you an e-mail informing you that the new hire candidate is ok to be hired once all of the exam results have been received. <ul style="list-style-type: none"> • Candidates must FIRST go to Concentra for their pre-employment physical exam and then will need to go to Express Drug Screening to take the drug test. Express Drug Screening is located at 2525 N Mayfair Rd. ○ Express Drug Screening's hours of operation are M-F 7:30-4:30. Candidates must arrive at Concentra by no later than 1 p.m. to ensure that they will have enough time to make it to the drug testing site before they close. • The pre-employment tests must be taken within no more than two business days of the date that the employment offer was accepted - be mindful of this when making a job offer.
5a.	Send an e-mail to: hirenotify@milwaukee.gov immediately after you have an accepted offer of employment to confirm that a job offer has been made & accepted, and that the new hire has been notified that they must take a pre-employment physical exam and drug test.
5b.	For positions requiring a CDL: <ul style="list-style-type: none"> • Also contact Jason Blasiola at Ext. 3462 or E-mail (jblasi@milwaukee.gov) immediately after you have an accepted offer of employment for positions requiring a CDL license to confirm that your new hire has been notified to report to a Collection Site for drug testing within two business days of acceptance. Jason will notify DER as soon as he receives results of the drug test.
6.	If your new hire is new to City employment they must complete an electronic form I-9. This MUST be done just prior to their start date (within 3 days) or ON their first day of employment. They MUST complete this form; it is a condition of their employment. <ul style="list-style-type: none"> • Be sure to give your employee the I-9 instructions that are included in the pre-employment packet that you received from DER. It describes in detail the two-step process that the employee must follow to complete the requirement.
7.	Verify Proof of Residency. (For nonresidents, make sure you monitor their efforts to move into the City to meet the residency requirements on the job announcement sheet.)
8.	Notify your payroll clerk of this new hire.
9.	Provide the attached "Safety Orientation" form to your new employee on his/her start date and review the items with the employee. Indicate the employee's name, your name and the date of the session on the form. Provide a copy to the employee, and place a copy in the employee's personnel folder.
10.	Give Attached "New Employee Orientation" form to new employees after filling in Date of Session. Call Judy at Ext. 3650 or E-Mail (jkamme@milwaukee.gov) to reserve a space for the new employee at that orientation session.

The following steps should be completed when interviewing and hiring new employees.